United States Environmental Protection Agency
Washington, D. C. 20460

Water Compliance Inspection Report

Section A: National Data Coding (i.e., PCS)

Transaction	Code	NPDES	yr / mo / dy	Inspection Type	Inspector	FacType
1 N	2 5	3 TNR0505644 11	12 110527 17	18 ~	19 S	20 2

Remarks

21 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 3 69	70 2	71 N	72 N	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (*For industrial users discharging to POTW, also include POTW name and NPDES permit number*)

Fleischmann's Yeast
2743 Riverport Road
Memphis, TN 38109

Entry Time / Date: 9:15 AM / 5/27/11
Permit Effective Date: 11/10/09
Exit Time / Date: 11:00 AM / 5/27/11
Permit Expiration Date: 5/14/14

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Mr. Rick Leggett
Bioprocessing Manager
Phone (901) 942-7115
Fax (901)942-7115

Mr. Dennis Beene
Safety Coordinator
Phone (901) 942-7115

Other Facility Data (*e.g., SIC NAICS, and other descriptive information*)

SIC 2099

Name, Address of Responsible Official/Title/Phone and Fax Number

Mr. Chris Syrigos (Plant Manager)
2743 Riverport Road
Memphis, TN 38109
(901) 942-7115

Contacted ☒ Yes ☐ No

Section C: Areas Evaluated During Inspection (*Check only those areas evaluated*)

☒	Permit	☒	Self-monitoring Program	☐	Pretreatment Program	☐	MS4
☒	Records / Reports	☐	Compliance Schedule	☒	Pollution Prevention		
☒	Facility Site Review	☐	Laboratory	☒	Storm Water		
☒	Effluent / Receiving Waters	☐	Operation & Maintenance	☐	Combined Sewer Overflow		
☐	Flow Measurement	☐	Sludge Handling / Disposal	☐	Sanitary Sewer Overflow		

Section D: Summary of Findings/Comments

(*Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary*)

SEV Codes	SEV Description
B 0 N 1 1	Failure to monitor

Name (s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Maylynne Pynkala Maylynne Pynkala Lindsay Barrios Lindsay Barrios	Tennessee Division of Water Pollution Control Memphis Environmental Field Office (901) 371-3027 | (901) 371-3170	6/9/11
Signature of Supervisor Reviewer Eddy Bouzeid Eddy Bouzeid	Tennessee Division of Water Pollution Control Memphis Environmental Field Office (901) 371-3023 | (901) 371-3170	6/9/11
Signature of Management Q A Reviewer Terry R. Templeton, P.G. Terry R. Templeton	Tennessee Division of Water Pollution Control Memphis Environmental Field Office (901) 371-3018 | (901) 371-3170	6/9/11

Section D: Summary of Findings / Comments

On May 27, 2011, Mrs. Maylynne Pynkala and Mrs. Lindsay Barrios conducted a Compliance Evaluation Inspection (CEI) at the Fleischmann's Yeast facility located at 2743 Riverport Road in Memphis, Tennessee. We met with Mr. Rick Leggett (Bioprocessing Manager) and Mr. Dennis Beene (Safety Coordinator) to review the facility's records and to discuss the facility's self-monitoring program. Afterwards, Mr. Leggett, Mr. Beene, Mrs. Pynkala, and Mrs. Barrios toured the facility. The following is a summary of the findings and observations.

I. Permit (Satisfactory)

Fleischmann's Yeast is covered under the Tennessee Multi-Sector Storm Water Permit (TMSP) with tracking number TNR050564. The TMSP authorizes the facility to discharge storm water associated with industrial activity into McKellar Lake via Outfall SW1.

The facility falls under Sector U (Storm Water Discharges Associated With Industrial Activity From Food Preparations, Standard Industrial Classification (SIC) code 2099) of the TMSP. Under Sector U, annual storm water sampling for Total Suspended Solids (TSS) is required at Outfall SW1. Quarterly visual inspections must also be conducted at Outfall SW1 and records of these inspections must be maintained on-site.

II. Records / Reports (Unsatisfactory)

A copy of the TMSP was available for review.

Records of Quarterly Visual inspections were available for review.

A review of the facility's records revealed that annual storm water sampling had not been conducted (see Sector U, Part 5, "Monitoring and Reporting Requirements" of the TMSP). Under SIC code 2099, storm water outfall samples must be monitored for TSS.

III. Facility Site Review (Satisfactory)

Fleischman's Yeast is a producer of baker's yeast, an ingredient used in baking products. The process involves a fermentation of baker's yeast primarily using a sterile molasses solution under controlled conditions. The facility has one storm water outfall (Outfall SW1) covered under the TMSP.

The following areas were observed/discussed during the site inspection:

The tank farm area consists of seven aboveground storage tanks that average about 6,000 gallons each (photo 1). They are located east of the plant structure and across from the molasses storage tanks. All of the tanks are in concrete spill containment pits large enough to hold the tank contents plus rainfall. The contents of the tanks are Defoamer Oil, Sulfuric Acid, Phosphoric Acid,

Nitric/Phosphoric Acid, 50% Caustic (Sodium Hydroxide), Diesel Fuel, and Propionic Acid. The chemicals are pumped to the plant via a concrete lined subsurface pipe chase. Anything discharged into the containment area is piped to the process drain then into the sanitary sewer effluent sump.

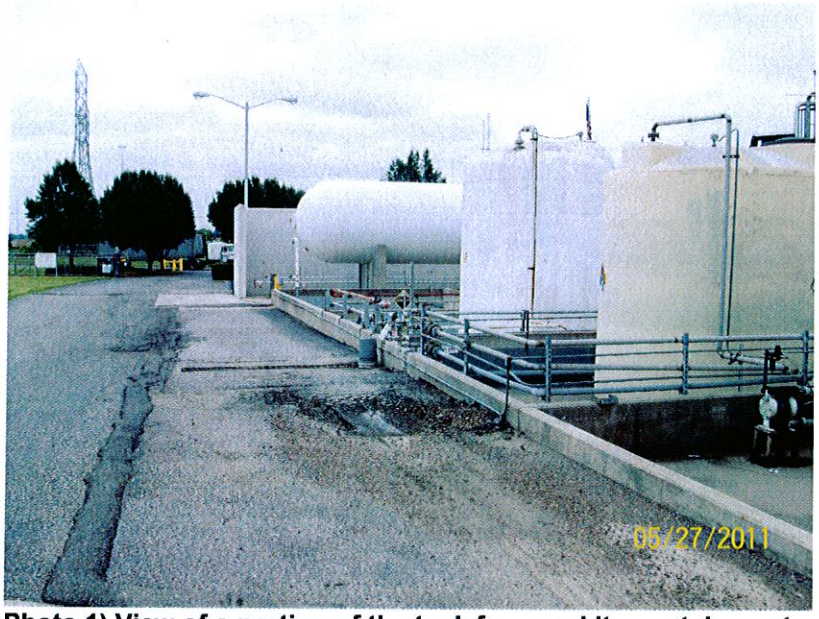

Photo 1) View of a portion of the tank farm and its containment area.

Molasses storage tanks (each approximately 600,000 gallons in capacity) are located on the northeast corner of the property (photo 2), across from the tank farm. Molasses is received either by barge or rail. There is a transfer pipeline from the dock to the molasses tanks. The tanks are surrounded by an unconfined concrete pad. Molasses is pumped to the facility via piping in a concrete lined subsurface piping chase. According to Mr. Leggett, any spills from the molasses tank area are discharged into the sanitary sewer.

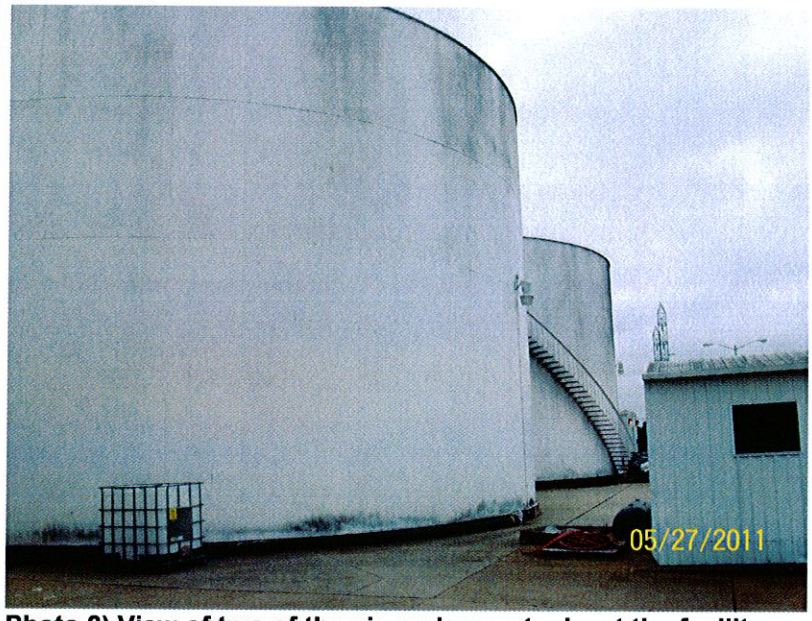

Photo 2) View of two of the six molasses tanks at the facility.

A cream yeast loading station with two cream yeast tanks is located outside directly between the first and second shipping docks at the rear of the plant. Effluent drains to the sanitary sewer are located in the immediate area of this loading station and west of the loading station with a dike on the north and south sides (photo 3).

Photo 3) View of the loading dock areas and cream yeast storage tanks (arrow).

A 34 cubic yard self-contained trash compactor is located on the edge of the rear lot, on a concrete pad, diked on three sides. The compactor is used for office trash, break room & non-biohazardous laboratory waste, plastic wraps, cardboard and packaging product waste. The compactor is completely enclosed (photo 4).

Photo 4) View of the trash compactor (arrow) and 3 dikes around the compactor.

Outfall SW1, which discharges directly into McKellar Lake, is located on the north side of the property (photo 7). There is a surface drainage inlet with a sliding gate valve located near Outfall SW1 (photos 5-6). At the time of inspection, the gate valve was open and storm water was discharging from Outfall SW1, due to a recent rain event on March 25, 2011. Oil sheen was observed in the surface drainage inlet structure (photo 6). According to Mr. Leggett, oil had accumulated in the surface drainage inlet as a result of Mississippi River floodwaters flowing back up into the storm drain system.

Photo 5) View of the surface drainage inlet (with a sliding gate valve) leading to Outfall SW1. At the time of inspection the gate was open (see photo 6).

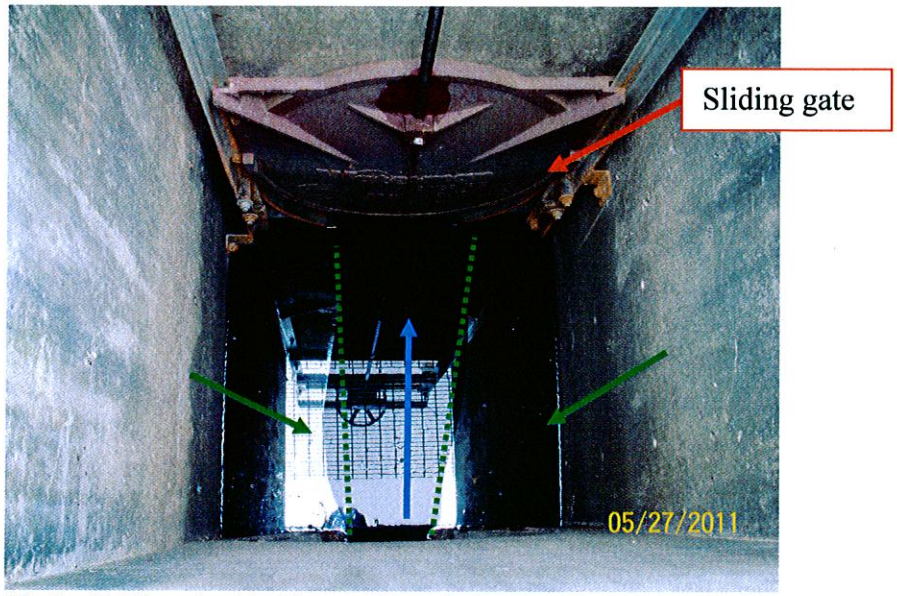

Photo 6) View inside the surface drainage inlet structure leading to Outfall SW1, showing the sliding gate (red arrow). Oil sheen was observed in the inlet structure (green arrows). Storm water was observed flowing through the inlet structure towards Outfall SW1 and McKellar Lake (the blue arrow shows direction of flow).

Photo 7) Outfall SW1 to McKellar Lake.

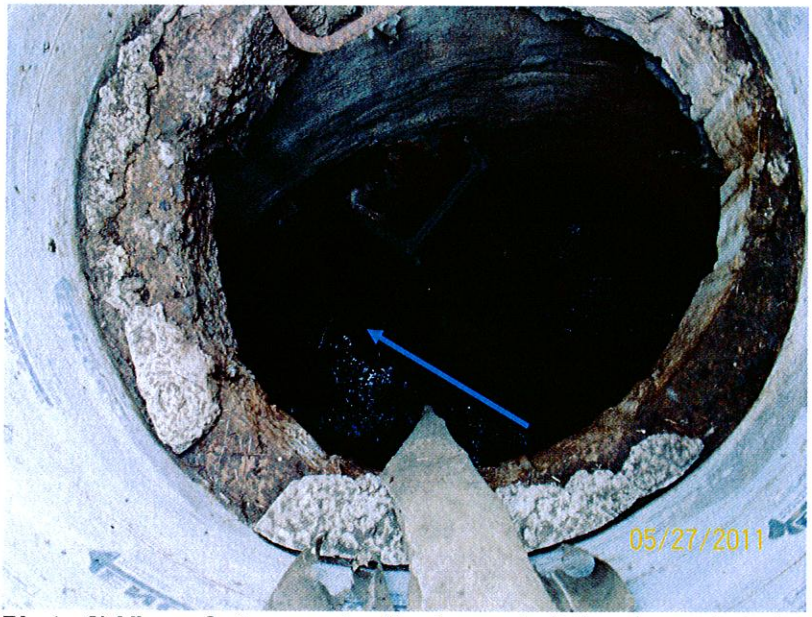

Photo 8) View of storm water flowing out of the storm drain towards Outfall SW1 and McKellar Lake. The arrow shows the direction of flow.

IV. Effluent / Receiving Waters (Not Applicable)

V. Flow Measurement (Not Applicable)

VI. Self Monitoring Program (Unsatisfactory)

Fleischmann's Yeast currently has an unreliable self-monitoring program because annual storm water sampling had not been conducted during the current permit term. The only annual monitoring records on file at the Memphis Field Office are from 1993 and 1995 monitoring events.

VII. Compliance Schedule (Not Applicable)

VIII. Laboratory (Unsatisfactory)

As mentioned in Part II of the CEI report, annual storm water sampling had not been conducted. Therefore, no analytical reports were available to review.

IX. Operation & Maintenance (Not Applicable)

X. Sludge Handling / Disposal (Not Applicable)

XI. Pretreatment Program (Not Applicable)

XII. Pollution Prevention (Satisfactory)

A copy of the Fleischmann's Yeast Storm Water Pollution Prevention Plan (SWPPP) dated September 22, 2009, was provided at the time of inspection. The SWPPP had been signed in 2011 indicating that it had been recently reviewed.

A copy of the facility's Spill Prevention Control and Countermeasures Plan (SPCCP) was available for review. The plan included the facility's spill incident reports dated December 1, 2008, January 23, 2009, and September 30, 2009. A review of the reports revealed that appropriate measures were taken to address the spills.

XIII. Storm Water (Satisfactory)

At the time of the inspection, there was a storm water discharge observed at Outfall SW1. Oil sheen was noted in the surface drainage inlet structure. Mr. Leggett indicated that the oil sheen was from the recent flooding of the Mississippi River that had caused flood waters from McKellar Lake to back up into the facility's storm drain system. According to Mr. Leggett the oil came from McKellar Lake.

XIV. Combined Sewer Overflow (Not Applicable)

XV. Sanitary Sewer Overflow (Not Applicable)

XVI. MS4 (Not Applicable)